



MURIEL GOODE-TRUFANT
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 Church Street
NEW YORK, NY 10007

JOSEPH ZANGRILLI
Phone: (212) 356-2657
Fax: (212) 356-3509
jzangril@law.nyc.gov
Senior Counsel

March 5, 2025

BY ECF

Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Robert Lee Murray v. City of New York, et al.,
21-CV-6718 (LJL)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and counsel for Defendant City of New York in the above-referenced matter. I write respectfully to submit this amended Valentin response to provide accurate information to Plaintiff regarding the identification of individual John Doe defendants.

By way of background, this action stems from an incident that allegedly occurred during Plaintiff's intake at Rikers Island. In the City's initial Valentin response dated September 27, 2024 (ECF No. 108), this Office identified several correction officers based on our understanding that the incident occurred on November 15, 2020, as stated in Plaintiff's Second Amended Complaint (ECF No. 103). However, as set forth in its prior motion seeking leave to amend our Valentin response (ECF No. 122), this Office identified the need to amend that response after receiving and reviewing video footage depicting the incident at issue. The Court granted that motion on consent and for good cause shown on February 5, 2025 (ECF No. 123). This amended response therefore incorporates our previous identifications and adds two additional correction officers who were also present during the incident in question.

Based on our investigation, including review of Department of Correction records and video footage, we have now positively identified the following individuals who were present during the search involving Plaintiff on November 14, 2020:

- Captain Cossette Christian, Shield #1756 (Active)
- Correction Officer Gary Davis, Shield #5658 (Resigned)
- Correction Officer Jose Ortiz, Shield #9124 (Active)
- Correction Officer Micah Brown, Shield #3042 (Resigned)
- Correction Officer Jamien Suarez, Shield #2389 (Resigned)

- Correction Officer David Rodriguez, Shield #18913 (Active)¹

Pursuant to the Court's February 5, 2025 Order (ECF No. 123), the City will either indicate that it is prepared to accept service on behalf of the individual defendants or shall provide Plaintiff with service addresses for the individual defendants by May 5, 2025.

The City thanks the Court for its time and consideration of this request.

Respectfully Submitted,

Joseph Zangrilli /s/

Joseph Zangrilli
Attorney for Defendant City
Senior Counsel
New York City Law Department
100 Church Street
New York, NY 10007
(212) 356-2657
jzangril@law.nyc.gov

Cc: **VIA FIRST CLASS MAIL**
Robert Lee Murray
B&C: 9902300038
North Infirmary Command
15-00 Hazen Street
East Elmhurst, NY 11370

¹ This Office notes that our investigation has revealed that CO Rodriguez was in the general proximity of the search area but did not have direct involvement with the search of Plaintiff on November 14, 2020.